REMARKS/ARGUMENTS

Applicants request that the Amendment After Final not be entered and that this Submission be considered along with the associated Request for Continued Examination. In light of the comments in the Advisory Action, the claims have been amended as set forth above to further clarify the claims. Applicants assert that the claims distinguish the cited references and that the case is in condition for allowance.

I.   Claim Objection

Claim 14 has been objected to as depending from a cancelled claim. The typographical error has been remedied as set forth above. Applicants respectfully request reconsideration.

II.   Rejections Under 35 U.S.C. 103(a)

Claims 1, and 6-8 are rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura et al (hereinafter "Altamura") in view of Sun Micro ("Star Office XML File Format Working Draft") (herinafter "Star"). Claims 10-12 and 16-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura in view of Star and further in view of Kink et al. (hereinafter "Kink"). Claim 4 is rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura in view of Star and further in view of Eisenberg (hereinafter "Eisenberg"). Claim 9 is rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura and Star and further in view of Pavlov. Claims 11 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura, Kink, Star and further in view of U.S. Patent No. 6,725,426 issued to Pavlov (hereinafter "Pavlov").

Applicants respectfully disagree with the rejections. Independent claim 1 includes the following combination of features that is not taught or otherwise suggested by the cited references:

> determining properties corresponding to a mini-document that relates to at least one section of an application document, *__wherein the mini-document includes a body portion,__* wherein the mini-document includes at least one member of a group comprising: a header and a footer;

mapping the properties of the mini-document into a markup language element, wherein mapping the properties includes mapping *a type attribute that corresponds to an occurrence pattern of the body of the mini-document within the application document, wherein the type attribute causes the body portion to be repeated in the application document in accordance with the occurrence pattern indicated by the type attribute*; and

storing the properties of the mini-document in the markup language document.

The above combination of features are not taught or suggested by the cited references. The Office Action cites to P8-1 and P9-3 of Altamura as teaching "mapping the properties of the additional mini-document into a markup language element, an attribute and a value." *Office Action* at pg. 6. The Office Action states that Altamura also teaches "storing the properties of the mini-document in the markup language document." *Office Action* at pg. 6. Altamura, however, fails to teach "mapping the properties of the mini-document into a markup language element, wherein mapping the properties includes mapping *a type attribute* that corresponds to an occurrence pattern of the body of the mini-document within the application document, *wherein the type attribute causes the body portion to be repeated in the application document in accordance with the occurrence pattern indicated by the type attribute*."

Sun Micro fails to remedy the lack of teaching in Altamura. In fact, Sun Micro teaches away from the above combination of features. Sun Micro teaches a footnote citation that is particular to a specific sentence of a particular page. Under the "Footnote Citation" and "Footnote Label" section, Sun Micro teaches that the numbering of the footnotes or the labeling of the footnotes are attributes to indicate each particular footnote in the document. Stated another way, Sun Micro is interested in citation type footnotes within a document that are particular to a specific document reference. In the "Footnote Body" section, Sun Micro teaches that "[t]he <text: footnote-body> element contains the actual content of the footnote. **It does not have attributes**." Sun Micro, at pg. 142 (emphasis added). Accordingly, Sun Micro teaches away from "mapping the properties of the mini-document into a markup language element, wherein mapping the properties includes mapping *a type attribute* that corresponds to an occurrence pattern of the body of the mini-document within the application document, *wherein the type attribute causes the body portion to be repeated in the application document in*

accordance with the occurrence pattern indicated by the type attribute." Accordingly, applicants assert that claim 1 is allowable.

Independent claim 10 includes the following combination of features that is not taught or otherwise suggested by the cited references:

> determining properties relating to a mini-document used within a word-processing document, *wherein the mini-document includes a body portion having text*; determining whether the mini-document is at least one member of a group comprising: a header and a footer;
>
> writing the properties into a markup language element, wherein writing the properties includes mapping *a type attribute that corresponds to an occurrence pattern of the text of the body portion of the mini-document within the word-processing document, wherein the type attribute causes the same text of the body portion to be repeated in the application document in accordance with the occurrence pattern indicated by the type attribute*; and
>
> storing the properties in the markup language document such that the headers and footers of the word-processing document are substantially maintained when the markup language document is parsed by an application.

The above combination of features are not taught or suggested by the cited references. Altamura, fails to teach "writing the properties into a markup language element, wherein writing the properties includes mapping a type attribute that corresponds to an occurrence pattern of the text of the body portion of the mini-document within the word-processing document, *wherein the type attribute causes the same text of the body portion to be repeated in the application document in accordance with the occurrence pattern indicated by the type attribute.*" Sun Micro fails to remedy the lack of teaching in Altamura. In fact, Sun Micro teaches away from the above combination of features. Sun Micro teaches a footnote citation that is particular to a specific sentence of a particular page. Under the "Footnote Citation" and "Footnote Label" section, Sun Micro teaches that the numbering of the footnotes or the labeling of the footnotes are attributes to indicate each particular footnote in the document. Stated another way, Sun Micro is interested in citation type footnotes within a document that are particular to a specific document reference. In the "Footnote Body" section, Sun Micro teaches that "[t]he <text: footnote-body> element contains the actual content of the footnote. **It does not have attributes**." Sun Micro, at pg. 142 (emphasis added). Therefore, Sun Micro teaches away from

"writing the properties into a markup language element, wherein writing the properties includes mapping a type attribute that corresponds to an occurrence pattern of the text of the body portion of the mini-document within the word-processing document, *wherein the type attribute causes the same text of the body portion to be repeated in the application document in accordance with the occurrence pattern indicated by the type attribute.*" Accordingly, applicants assert that claim 1 is allowable.

Independent claim 18 has been amended to include the following combination of features that is not taught or otherwise suggested by the cited references:

a processor; and

a memory associated with computer-executable instructions configured to:

determine properties relating to a mini-document included in at least one section of an application document, *wherein the mini-document includes a body portion having text*;

determine whether the mini-document is at least one member of a group comprising: a header and a footer;

map the properties into a markup language element, wherein mapping the properties includes mapping *a type attribute that corresponds to an occurrence pattern of the text of the body portion of the mini-document within the application document, wherein the type attribute causes the same text of the body portion to be repeated in the application document in accordance with the occurrence pattern indicated by the type attribute when the application document is generated from the markup language element*; and

store the properties in the markup language document; and

a validation engine configured to validate the markup language document.

The above combination of features are not taught or suggested by the cited references. Altamura, fails to teach a system to "map the properties into a markup language element, wherein mapping the properties includes mapping a type attribute that corresponds to an occurrence pattern of the text of the body portion of the mini-document within the application document, *wherein the type attribute causes the same text of the body portion to be repeated in the application document in accordance with the occurrence pattern indicated by the type*

attribute when the application document is generated from the markup language element."
Sun Micro fails to remedy the lack of teaching in Altamura. In fact, Sun Micro teaches away
from the above combination of features. Sun Micro teaches a footnote citation that is particular
to a specific sentence of a particular page. Under the "Footnote Citation" and "Footnote Label"
section, Sun Micro teaches that the numbering of the footnotes or the labeling of the footnotes
are attributes to indicate each particular footnote in the document. Stated another way, Sun
Micro is interested in citation type footnotes within a document that are particular to a specific
document reference. In the "Footnote Body" section, Sun Micro teaches that "[t]he <text:
footnote-body> element contains the actual content of the footnote. **It does not have
attributes**." Sun Micro, at pg. 142 (emphasis added). Therefore, Sun Micro teaches away from
a system to "map the properties into a markup language element, wherein mapping the properties
includes mapping a type attribute that corresponds to an occurrence pattern of the text of the
body portion of the mini-document within the application document, *wherein the type attribute
causes the same text of the body portion to be repeated in the application document in
accordance with the occurrence pattern indicated by the type attribute when the application
document is generated from the markup language element*.". Accordingly, applicants assert
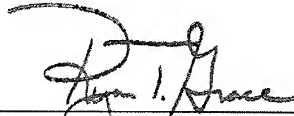that claim 18 is allowable.

With regard to the dependent claims, the dependent claims include features that are not
taught or suggested by the cited references. Furthermore, the dependent claims ultimately
depend from the independent claims above. As such, they are thought allowable for at least the
same reasons set forth above.

III.   Request for Reconsideration

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

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Respectfully submitted,

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